Seattle City Light Public Rate Review March-April 2006

Summary of Comments April 25, 2006

Executive Summary

Nearly 100 people participated in a series of Seattle City Light rate review forums in March-April 2006. The three discussion sessions, which were held in north Seattle, Rainier Valley, and downtown, were designed to elicit a broad diversity of opinions from City Light ratepayers. The facilitated discussion sessions focused on eleven key rate issues that are central to this year's rate review process.

The forums were widely advertised and promoted, and were supported by information on City Light's website, and by a call-in television show that featured City Light Superintendent Jorge Carrasco. The opinions gathered through this process will be used by Superintendent Carrasco and Mayor Greg Nickels as they determine if, and how, changes should be made in Seattle City Light rates for 2007-2008.

Discussion Summary of Key Issues

Opinions were wide-ranging at the three forums; the results are summarized as follows:

1) City Light should offer seasonal rates, but make sure to emphasize the Average Payment Plan when those rates are introduced.

Forum participants agreed that the conservation message sent through the use of seasonal rates is an important one, and generally supported City Light's return to this rate structure. However, they also wanted to make certain that customers receive ample and adequate information about the Average Payment Plan, so they can take advantage of more evenly-priced monthly bills if that would be of benefit to them.

2) Keep low-income rates where they are.

No one is clamoring to raise the low-income rate from its current 40% of the regular residential rate to 50% of the residential rate. Those paying the regular residential rate do not mind paying the 78 cents it currently costs per month to assist low-income customers. Commercial and industrial customers also do not object to the current rate, and do not believe that an increase in this low-income rate would be beneficial to other customer classes.

3) Explore a possible increase in the suburban rates.

While there are objections to this increase from some suburban city customers, other customers within the City of Seattle believe that the increase is justified if, in fact, the cost of service to these customers is higher than the cost to serve in-city customers. They emphasize that the existing agreements allow for an increase, and that City Light should take advantage of this existing clause in those agreements.

4) Raise streetlight rates gradually.

Virtually all of those participating in the discussions recognize that they will pay for streetlights in one form or another – either through rates or through City of Seattle taxes. Most felt that the sharp increase in streetlight rates should be phased in over time and not levied on the City all at once.

5) Implement balanced increases in network rates.

This was one of the most contentious issues raised at the forums. Network customers are clearly opposed to an increase, but out-of-network customers believe that the true cost of service should be reflected in network rates. Of course this is a delicate balance, since it is important to encourage strong economic/job growth in the network areas, but there is also the perception that it is unfair for network customers to enjoy all of the benefits without paying the price for doing so. At the very least, those customers within the network on First Hill and in the University District should be required to pay some of the cost differential to provide this service, and many in the discussion groups felt that increases in the current network rate were also justified.

6) Explore innovations for the new large loads ordinance.

Forum participants had a number of creative ideas on ways to make this ordinance more effective and/or eliminate the ordinance, but still recover some of the infrastructure costs associated with serving these customers. The ideas shared in the forums provide an excellent opportunity for City Light, and for the City of Seattle in general, to maintain communication with key customers, perhaps holding additional discussion sessions to collaborate on changes to how these loads are defined and financed over time.

7) Increase the pole attachment rates to the full cost of providing this service.

The opinion was unanimous that pole attachment "rental rates" should be increased by 26%.

8) Offer interruptible rates to a larger group of customers.

Those industrial customers who can benefit from interruptible rates are highly enthusiastic about the potential benefits these rates can provide to both the Utility and to this customer class. The Utility should explore the possibility of expanding these rates to include more customers, understanding that flexibility will be required in order to structure the rate to meet the specific needs of the individual large customers. Costco, for example, has different requirements than Nucor.

9) Consider improved incentives for the purchase of capacitors.

Those customers who are currently paying the low power factor charge say that the high price of capacitors serves as a barrier to their purchase of this power quality equipment. They urge City Light to offer a higher rebate on such purchases, moving forward with a "carrot not a stick" approach to improving power quality.

10) Continue discussions on distribution capacity charges.

Customers had more questions than recommendations about the potential for this new charge. The Utility should take more time to describe how it would work, and how that charge would be calculated on existing vs. new distribution lines. This fee is not yet ready to be introduced to commercial/industrial customers.

11) Continue with a variable rate, but be revenue neutral.

Customers like the market choice provided by the variable rate, and generally believe it should be kept as an option. However, they urged that City Light "be indifferent to it", especially given that virtually no customers are taking advantage of the variable rate structure at this point in time.

Overview

Throughout March-April 2006, Seattle City Light conducted a public involvement program to engage a diverse mix of City Light ratepayers in discussions about eleven key cost allocation issues that are central to this year's rate review process. The opinions gathered through this process will be used by Utility Superintendent Jorge Carrasco and Mayor Greg Nickels as they determine if, and how, changes should be made in Seattle City Light rates for 2007-2008.

The goals for this public involvement program included:

- Ensure that City Light ratepayers are well-informed about the rate process and about the opportunities to comment on electrical rates.
- Engage stakeholders in substantive discussions related to the challenges and issues associated with the rate review process.
- ➤ Clearly demonstrate that public opinion has been considered in subsequent rate making decisions made by the Mayor and the Seattle City Council.

Public Involvement Opportunities

The public involvement program included myriad ways to be informed and involved in the rate review, including the utility's website, a SEA-TV production that aired on April 3 (and other dates), and three discussion forums, which were conducted on March 30, April 10, and April 11.

The forums were advertised through postcard mailings to 37,000 City Light customers, as well as through email invitations to 2,000 customers. Fourteen hundred of those contacted through email were the Utility's major commercial/industrial accounts, and the other 600 were representatives of various neighborhood associations and other key stakeholders throughout the City. In addition, the forums were advertised in the Seattle Times and PI, the North Seattle Herald/Outlook, Queen Anne News, Magnolia News, Capitol Hill Times, Ballard News, Beacon Hill/South District Journal, West Seattle Herald/White Center News, and the Highline News. The forums were also listed on community calendars in the weekly papers and in the Seattle Times "Here and Now" section.

Seattle City Light's website was another source of both information and promotion about the process. The website contained numerous links to rate review publications and other Utility information, advertised the forums, and invited the public to submit email comments. Between February 23rd and April 13th, 1,318 people visited the SCL rate process webpage and 509 people viewed the flyer for the forums. Four people chose to submit comments via email. One urged the Utility to keep conservation as the number one priority for its future investments. Two others urged Superintendent Carrasco to maintain investments adequate for continued infrastructure improvements. A fourth urged City Light to re-establish the Rates Advisory Committee that was discontinued in 2004.

A SEA-TV call-in production featuring Superintendent Jorge Carrasco aired on April 3, and garnered five call-in questions during the hour on the air. The 30-second spot advertising this show was aired twenty-nine times between March 27 and April 3rd.

Rate Forums

The rate forums were held at City Light's North Service Center on March 30, at the Rainer Valley Cultural Center on April 10, and at the Seattle Municipal Tower on April 11. Five people attended the first forum and were primarily residential customers of City Light, although a city councilwoman from Shoreline also attended that meeting. Twenty-six people attended the Rainer Valley forum. Again, these were primarily residential customers, but participants also included a business owner from the suburban city of Tukwila. The sixty-five people in attendance at the downtown meeting were representatives of either commercial/industrial or suburban city ratepayers.

To make the issues as easy to understand as possible, a discussion guide was prepared in advance of the forums. This guide described the eleven key rate questions that had been previously identified by both the Utility and Mayor Greg Nickels. Participants were asked to RSVP to the forums, and were encouraged to review the discussion guide prior to the meeting. The discussion guide was divided into two sections: one describing the seven issues most relevant for commercial/industrial customers, and a second residential section that included the four issues most relevant to that customer class. All three of the forums, however, addressed both residential and commercial/industrial issues. The discussion guide is attached as an appendix to this report.

Each forum began with a welcome and overview from Superintendent Jorge Carrasco. At the downtown meeting, this welcome was extended to include a presentation on the current financial health of the utility. After this introduction, Finance Director Mark Dombroski presented "Ratemaking 101", a powerpoint presentation that provided an overview of the rate setting process and of the eleven key cost allocation questions.

Following this presentation, facilitator Margaret Norton-Arnold led attendees at the first two forums through the discussion guide. Responses and comments were recorded on a large notepad in the front of the room. At the downtown meeting, Margaret was joined by three additional facilitators, who each led discussion groups of 12-18 participants.

Margaret summarized the comments back to meeting attendees throughout the discussion at the first two meetings. At the downtown meeting, all of those participating in the small group discussions reconvened to hear reports from each of the groups. At the end of each forum, after the rate issues had been discussed, the meetings were opened up to general comments and questions from the assembled group.

A summary of each meeting follows.

Meeting One – Residential Customers March 30, 2006 – Seattle City Light North Seattle Service Center, 1300 North 97th St. Five people participated in this discussion.

Seasonal Rates

Customers at this meeting believed that seasonal rates are generally a good idea, but that the difference in the cost of producing power between "winter" and "summer" should be clearly demonstrated to the general public. A couple of participants appreciated the conservation message that can be sent through the use of seasonal rates, and believed that these price signals would encourage customers to cut down on their energy consumption. Those participating also wanted to

make sure that customers have the option to participate in bill "averaging", so that their electricity bills would be more even throughout the year. Attendees also suggested that the seasons be evenly spaced and split so that all customers would be assessed the winter price for the same number of months. This would result in an 8-month 4-month split, or even a 6-month split if possible.

Low-Income Rates

Most participants did not feel that the low-income rate needed to be raised from its current 40% to 50% of the regular residential rate. This made particular sense when the cost of assisting with this low-income rate was discussed; customers paying the regular monthly rate currently pay about 78 cents per month to help qualified low-income customers. That just isn't very much money, and we shouldn't worry about having to pay it, said one participant. Another comment was that an increase to 50% of the regular rate would have a significant impact on low-income customers, but a negligible benefit to those paying the regular residential rate.

One attendee felt that raising the low-income rate to 50% of regular rates is a good idea, as it is still a substantial discount, and that the increase would do more to encourage conservation. Another participant felt, however, that the low-income rate should be less than the 40% currently charged.

Participants wanted to make sure that the availability of low-income rates is well publicized to all of those who might qualify.

Suburban Rates

Regardless of the forum location, the responses to the issue of raising rates to the suburban cities as allowed for under existing agreements were consistent in all three discussions. For the most part, customers inside the city limits of Seattle believe these rates should be raised in line with the negotiated agreements. Suburban customers, on the other hand, believe they are paying enough for electricity already, and hope that their rates will not be increased.

At this forum, for example, the city councilwoman from Shoreline had numerous questions about the level of service currently being provided to that city, and wondered if it could be demonstrated that it costs City Light 6-8% more to provide service to Shoreline. She said that costs were already too high, and that Shoreline rates should not be raised.

Other discussion participants felt that the true cost of service should be reflected in the suburban rates, and that an increase should be explored if already allowed for under the agreement. The comment was also made that these higher rates encourage conservation.

Streetlights

Participants at both this and the second forum quickly ascertained that, while they may not be paying the full cost of streetlights through their electricity bills, they would certainly end up paying that full cost through other taxes to the City of Seattle, given that the City owns 80% of the streetlights in the city. They urged that the streetlight rate be increased gradually over the next two-three rate cycles, in order to minimize the financial impact to the City's general fund.

Network Rates

Some of those participating in this discussion were worried that an increase in network rates could mean an economic downturn for the city. *Economic development is important. We don't want to lose*

downtown businesses. A bigger issue for this group, however, was the inconsistency in network rate policies. All felt, for example, that network customers in the University and First Hill business districts should be charged the same rate as the downtown network customers. And one attendee felt strongly that downtown residential and small business customers should also be paying the network rate, given that they benefit from network reliability.

New Large Loads

Most participants at this meeting agreed that the current ordinance is simply not working, and that remedies are in order. They felt that a reasonable fix would be for developers to pay for the cost of their own transformers, perhaps amortizing that cost over several years. The advantage of this, they said, was that it would force developers to make better estimates of their power needs, and that it is a move toward "growth paying for the cost of growth." Participants did recognize that developers would, in the end, simply pass this cost on to their building tenants. And again, the concern was expressed that this type of a fee might discourage new economic development within Seattle: Having developers pay for their own transformers may work in a strong economy, but I don't think it would work in a weaker economy, said one participant.

Pole Attachment Rates

All of those participating in this discussion felt that the pole attachment rates should be increased by the 26% that has been proposed. They thought it was reasonable that those who use these poles pay their full share of a "rental fee", as long as the costs of providing this service can be justified.

Interruptible Rates

Discussion participants concluded that the interruptible rate structure should be modified so that more customers can take advantage of it. They urged City Light to take the lessons learned from the one contract with Nucor, and work with other customers to put this type of a rate into effect. The sense of the group was that interruptible rates are beneficial to the customer, and, at the same time, help Seattle City Light to both manage demand and to minimize the level of infrastructure investment required from the Utility. The comment was also made that there is a growing number of industrial customers that may be amenable to an interruptible rate structure.

General Comments and Questions

A member of the Seattle Astronomical Society said there are many types of streetlights that have varying degrees of light pollution, and that all future fixtures should meet the best standards possible for light pollution.

There were also some questions and discussion about City Light's conservation programs, specific projects going on in Shoreline, and the role of renewable energy sources in City Light's generation portfolio.

Meeting Two – Residential Customers

April 10, 2006 - Rainier Valley Cultural Center, 3515 S. Alaska St.

Twenty-four people participated in this discussion.

Seasonal Rates

Participants at this meeting were not particularly enthusiastic about seasonal rates. Many were frustrated already by their high electricity bills during the winter, and were fearful that those bills might be even higher through the use of seasonal rates. While bill averaging could possibly help to alleviate the higher winter rate, the general overriding concern throughout this discussion was the high cost of electricity. Just when we need that heat and light the most, the price goes up, said one attendee. It is really difficult to be able to pay that high bill.

Participants suggested that Seattle City Light trade power with California, supplying power there in the summer when air conditioning is needed, and buying power from California during Seattle's winter months.

Low-Income Rates

This group expressed the strong sentiment that low-income rates should remain at their current 40% of the regular electric rate. One rationale was that low-income customers are often on fixed incomes, and those incomes are not likely to rise in proportion to the percentage increases required to raise the rate to 50% of the regular rate. Most of those attending the meeting urged City Light to leave the rate at its current 40%, and one participant suggested that City Light incorporate a "sliding scale" to determine low-income need and corresponding rates. *Income gaps between rich and poor have increased, and they are continuing to increase. Leave this rate where it is.*

Suburban Rates

Several participants felt that it was unfair to "penalize" customers just because they live in the suburbs. One comment was that the proposed increase in suburban rates *seems arbitrary*. Others felt the suburban rate should not be increased because City Light benefits from having the suburbs as customers, and another comment was that the suburbs should experience increases only if City of Seattle residents are also going to see an increase in their rates.

A commercial customer from Tukwila said that he feels that he is being taxed twice on his utility bill, once from Seattle and then again from Tukwila.

Other participants felt it was fair for suburban cities to pay a higher rate. The rationale for their arguments included the fact that those located outside of the City do not pay Seattle taxes; City of Seattle residents paid for the initial investments in the Skagit Dams and other facilities and should therefore benefit from those investments. Another opinion was that the suburban cities know these increases are possible because they are already provided for in the existing agreements, and therefore it is okay to raise the suburban rates.

Streetlights

Similar to the March 30 meeting, participants expressed the view that increases in streetlight rates will impact Seattle residents one way or another – either through electricity rates or through taxes. Opinion was divided on whether or not these rates should be raised gradually or all at once. Some

felt the City could afford the increase all at one time, while another participant said: I'm worried that if the City of Seattle has to handle a big streetlight rate hike all at once it they might have to cut back on other city services. Several people commented on the importance of streetlights to the overall safety and wellbeing of Seattle's residents.

Network Rates

Many at this discussion forum felt that the network rate should be increased. They understand that network electricity is "premium power" and they urged City Light to ask network customers to pay their fair share of delivering this service. One meeting participant had been a member of a previous City Light rates advisory committee, and said that committee had already recommended that network customers pay the full cost of providing this power. He wondered why that recommendation had not been put into effect. A few of those participating in the discussion were concerned that higher network rates might hamper economic development, and wondered, for example, what affect this would have on businesses that might want to locate in the South Lake Union area.

Pole Attachment Rates

Virtually all of those participating in the discussion said City Light should raise its fees for companies to use electricity poles for other purposes. They viewed this as a way for City Light to take advantage of the full cost benefit of owning the poles. A few mentioned that they would end up paying the cost of this increase anyway, since cable television companies, for example, are likely to pass those costs on to their customers.

General Comments and Questions

There was discussion about offering larger rebates for the purchase of energy efficient appliances. The comment was made that current rebates are not enough of an incentive, and that they are confusing.

One participant wondered if his meter was actually being read, as he has not seen City Light meter readers at his home. His monthly bills have large variations, and he is concerned that his meter is not being read correctly or at all.

There were numerous questions and significant discussion on who qualifies for the low-income rate, how those customers are notified, and how those struggling with their utility bills can get help.

Meeting Three – Business Customers

April 11, 2006 – Seattle Municipal Tower, 700 5th Ave
Sixty-five people participated in this discussion.

Network Rates

Opinion was strongly divided on the question of network rates, and whether or not network customers should pay more of the cost differential to provide this highly-reliable, high-quality power.

Some forum participants recommended leaving network rates as they are. They were concerned about how large the increase would be for those in the network area, and recommended that, if there is an increase, it be phased in gradually. One point raised in this regard was that large

consumers on the network should not have to pay a higher rate, because they are already paying so much by virtue of their large power consumption. Another issue had to do with previous decisions to locate businesses in the Seattle area: Why should those on the network have to deal with a higher rate now if they located in the network for that rate? asked one participant.

Others argued that an increase in the network rate would drive business, and jobs, out of Seattle. Raise the rate, and you just make Bellevue and Tacoma all the more attractive, said one attendee.

Others disagreed sharply, and thought that those on the network should pay more for the reliable system they enjoy. Cost of service was very important to this group of customers who are not in the network now, and who do not benefit from the reliability of network power. We would love to have that level of power reliability, said one attendee, but we get absolutely no network benefit. The cost of that reliability should be reflected in the network rates. These non-network industrial customers also felt that residential and smaller commercial customers in the network should pay higher network rates. In addition, they believed that customers in the University and First Hill networks should pay for the cost of that service.

And, there was disagreement on the effects of higher network rates on economic development. From one participant: The guiding principle should be to pay the cost of service and leave the social engineering to the Legislature.

New Large Loads

Virtually all of those attending this forum believed that changes to the New Large Loads Ordinance were in order. Participants thought perhaps a sliding scale could be applied to new large loads, scaling the charge per the size of the new load. Other ideas included keeping the new large load ordinance, but making decisions on the charge case-by-case and including some exemptions or standard reductions for certain customers, such as hospitals and non-profit low-income housing. One participant asked: How much of an impediment to new development would it be to charge developers for their new large loads? And from another: Will the charge apply to existing customers who are expanding their facilities?

One argument against the new large loads ordinance was that the "stranded costs" that had been originally feared by the Utility had simply not come to pass. New data centers have been established, for example, that have taken advantage of the infrastructure investments previously made by City Light. These data centers are great customers, said one attendee. They are stable customers; their usage patterns are fully predictable, 24 hours a day. We should be encouraging these customers, said participants, not driving them away. End the new large loads ordinance.

Other participants recommended that Seattle City Light consider other mechanisms, such as performance bonds, to ensure payment of costs associated with large loads. Some stakeholders advocated *closing this loophole* by dealing with this issue legislatively.

In an opposing opinion, a few participants said that new large loads, in combination with existing needs, will put tremendous pressure on the existing City Light infrastructure. The new large load charge, they said, is a fair way to pay for infrastructure upgrades.

Power Factor Charge

Most participants felt that the current price of capacitors is too high, and that this is a significant barrier to businesses to substantially improve their own power quality. They urged a "carrot rather than a stick" approach. Offer a higher rebate for purchasing the capacitor, they said. The current payback time is too high. A three-to-five year payback period, in contrast, would serve as a strong incentive for us to make the change.

Several customers commented on the impacts of an increase in this rate to the manufacturing community, specifically: a big hit like that to manufacturing is not in sync with Mayor Nickels' commitment to keeping the Interbay area a place for manufacturing." Other attendees said that the low power factor rate increase is a good start to addressing the impacts to the system, but that it should be done gradually.

Pole Attachment Rate

Most of those attending this forum thought the pole attachment rate should be increased by 26% to recover the cost of leasing and maintaining the poles. Some raised the concern that those that lease the poles, such as television cable companies, will just pass that cost onto their customers. One customer asked: *How is the cost to lease and maintain the poles calculated*?

Interruptible Rates

Many participants said that interruptible rates provide a win-win situation for both City Light and its customers. They recommended that these rates be offered to a broader group of customers, and that they also include a realistic demand threshold. One participant said: It doesn't hurt to offer interruptible rates if prequalification requirements are met and the outcome is revenue neutral.

Additional enthusiasm for interruptible rates included: These rates are cheap, reliable, and environmentally friendly. They should be extended to other customers.

One participant described the technology advances that have made the applicability of interruptible rates more feasible. He described new European equipment, for example, that signals to the customer and the utility when service might most readily be interrupted. The Bonneville Power Administration has been conducting pilot programs with this new equipment.

Some customers, such as Costco, have been unable to take advantage of interruptible rates given their hours of peak demand. They asked that City Light create a more flexible rate schedule to allow for their participation in this rate program.

Some participants were concerned about the expansion of interruptible rates to a larger pool of customers. They were concerned about the impacts of too many large customers "betting" on lower rates, as well as what those customers' reactions would be if their service was actually interrupted. They felt this would be a revenue loss to City Light, and that other ratepayers would have to pay the difference. These participants believed that offering interruptible rates on a contract basis might be a safer way to proceed.

Distribution Capacity Charge

There were more questions than recommendations related to the distribution capacity charge. Several wondered how the charge would be calculated; for example, how would the price change if it was related to an existing feeder line vs. a new feeder line? Some participants recommended: *City*

Light should provide this reserve capacity if customers are willing to pay for it and it does not entail adding expensive infrastructure.

Variable Rates

Some meeting attendees felt that there is no point in keeping this rate if no one is using it. Others disagreed, asserting that retaining variable rates is acceptable if transmission costs are commensurate with the cost of service. One noted that over a three-to-five year period, customers will not take advantage of variable rates. Another said, Offer variable rates. They're not a bad market check. Let the customer decide. Yet another opinion was: City Light should maintain a variable rate, and then be indifferent to it.

One participant pointed out that the big issue for Seattle City Light is stranded costs, and that City Light should carefully examine this potential risk.

Seasonal Rates

Although some participants felt that seasonal rates should be implemented, they also felt strongly that bill averaging should be offered at the same time. Several attendees thought the higher winter rate was a good price signal to encourage people to conserve energy. One participant thought it would be helpful if City Light bills gave very clear information on the amount of electricity customers are using at the different seasonal rates.

Low-Income Rates

There was discussion about the electricity consumption rate of low-income customers, and some speculation as to why they seem to use more energy than other customer classes. Some participants advocated more outreach about conservation to low-income customers. Many thought it would be fine to keep the rate at 40% of regular residential rate, saying that raising the rate to 50% would certainly not make a significant difference to either the overall system or to City Light's commercial/industrial customers.

Suburban Rates

Opinions were sharply divided on suburban rates. Some participants said: If it is already a part of the negotiated agreement, why wouldn't you take advantage of the opportunity to raise those rates by two percent? As expressed earlier, the cost of service was a major issue for this customer group.

Meeting attendees who represented suburban cities, however, felt otherwise. The representative from Shoreline, for example, expressed her opposition to any rate increase, saying that electricity rates are already too high for that city. Similar to the meeting at the Rainer Valley Cultural Center, the business owner from Tukwila explained, again, that Tukwila customers are already paying twice for electricity. *The policy is unsound and inequitable*, he said.

General Comments and Questions

A number of the participants at this forum believed that the wrong questions were being asked. Let's change the basic assumptions, they said. What about reducing the revenue requirement? What about reducing the underlying assumptions about what the Utility needs to operate? Let's start there, and after that we can discuss cost allocations.

A number of customers also wanted to know about the possibility of actually reducing rates in the near future. They asked Superintendent Carrasco when this rate reduction might occur. One

participant stated that conservation has greatly helped City Light, reducing both demand and the need for additional distribution infrastructure. He will continue to support the higher rates as long as conservation is front and center on the Utility's agenda.

Other participants requested that, if rates cannot be lowered at this time, at least they should not be raised.

One attendee wondered what had happened to City Light's rate advisory committee. That group was effective in the past, he said, in engaging Seattle residents and business owners in the structure of City Light rates. He urged City Light to reinstitute this committee. This sentiment was echoed by another participant in an e-mail to City Light and City Councilwoman Jean Godden. It was further pointed out that Council Resolution 25387 specifically addresses this issue: "To ensure citizen participation, City Light shall seek input from a variety of ratepayer sources, including a Rate Advisory Committee."